

Chichester Local Plan Examination – Hearing Statement

Matter 3: The Spatial Strategy

Questions 13 - 19

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Matter 3: The Spatial Strategy

This hearing statement has been produced as part of the examination of the Chichester Local Plan. It answers the Inspectors' questions 13-19, relating to **Matter 3: The Spatial Strategy**

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Matter 3: The Spatial Strategy

Issue: Is the spatial strategy positively prepared, justified, effective, and consistent with national policy?

Policy S1 Spatial Development Strategy

Q.13 What is the justification for the proposed distribution of development in the plan area?

- 1.1 The supporting text to Policy S1 para 3.5 of the Plan, sets out the range of factors which have informed the spatial strategy.
- 1.2 Further detail on the evidence that has informed the spatial distribution of development in the plan area is set out in the Housing Distribution Background Paper (BP05). This explains in paras 3.6 – 3.8, the role of the Settlement Hierarchy evidence (see also Settlement Hierarchy Update Background Paper (BP11)) in setting the hierarchy of settlements within the plan area, which has informed the spatial distribution set out in Policy S1, with the greater proportion of development in the larger and most sustainable settlements (within or adjacent to the sub-regional centre of Chichester city, at settlement hubs of Southbourne and Tangmere, then at the service villages of Bosham, Hambrook and Loxwood).
- 1.3 As set out in para 3.9 of the Housing Distribution BP, the Housing and Economic Land Availability Assessment (HELAA, April 2021, H09) provided the initial evidence on the availability of potential housing sites, their deliverability and phasing.
- 1.4 Para. 3.10 of the Housing Distribution BP sets out that the Sustainability Appraisal has been a key piece of evidence underpinning the housing distribution.
- 1.5 The spatial strategy has also been informed by evidence on environmental and infrastructure constraints which included:
 - Landscape Capacity Study (March 2019, CC01.01 – CC01.05), which included a high level assessment of landscape capacity.
 - Level 1 and Level 2 Strategic Flood Risk Assessment (December 2023, CC06, CC07, CC08) which informed the Sequential and Exceptions Tests (January 2023, CC05 and April 2024, CC04) necessary to steer new development to areas with the lowest risk of flooding from any source.
 - Estimated Wastewater treatment headroom monitoring and position statements (CC11 – CC17) to ensure that the wastewater arising from the chosen development distribution can be accommodated within the network and treated. The agreed position on this issue is set out in the Statement of

Common Ground between the council, Environment Agency and Southern Water (April 2024, SC02).

- The development of a Nutrient Budget (see Nutrient Budget Background Paper, May 2024, BP08) to ensure that the planned development can achieve nutrient neutrality.
- The development of Strategic Wildlife Corridors which have been identified, mapped and are to be safeguarded through Policy NE4 (see Strategic Wildlife Corridors Background Paper, June 2024, BP13) to ensure habitat connectivity and passageways for wildlife through the landscape.
- The development of an approach to address water neutrality (see Water Neutrality Joint Topic Paper (May 2023, CC20) and Water Neutrality Study (Part A, July 2021, CC23.01, Part B, April 2022, CC23.02 and Part C, November 2022, CC23.03) in order to ensure that new developments within the Sussex North Water Resource Zone are water neutral.
- The Transport Background Paper (July 2024, BP14) sets out how the transport evidence (transport studies from 2018 – 2024, TA01 – 06) has informed the amount of development in the southern plan area, in recognition of the highways constraints presented by the A27.
- The development of the Infrastructure Delivery Plan (April 2024, IN01) in consultation with infrastructure providers has also informed the spatial strategy.

1.6 The Housing Distribution BP section 4, sets out the consultation processes at Issues and Options and Preferred Approach stages in the production of the Plan, and explains how the distribution of housing was developed and amended at each stage.

1.7 Whilst the exact distribution of numbers of units between settlements has varied over the course of the development of the Plan, the broad thrust of the spatial strategy has remained constant since the outcome of initial Issues and Options consultation, which selected a scenario which entailed:

- Consolidating and enhancing the role of Chichester city as the plan's main area, while also developing the role of key settlements to its east and west.
- Protecting and enhancing the special qualities and environment of the Manhood Peninsula, requiring a selective and sensitive approach to its development.
- Placing the emphasis on maintaining the rural character of existing villages in the northern part of the plan area but recognising Loxwood as a settlement having greater development potential.

1.8 The strategy also supports economic growth, focussing employment within and close to Chichester city.

1.9 Overall, the approach to the distribution of development has been an ongoing and iterative process. In essence, this has been underpinned by the Settlement Hierarchy (BP11), and evolved through testing of different options as part of the SA process and through responding to comments submitted via the Issues and Options and Regulation 18 consultations. The Regulation 19 version of the SA involves a comprehensive appraisal of the distribution of development, and how this relates to reasonable alternatives. The resulting spatial strategy is considered to be the most appropriate approach for addressing many of the issues faced in the plan area and delivering a sustainable Plan.

Q.14 In assessing the transport impacts of housing growth, what reasonable alternative levels of housing growth were considered for the southern plan area and why were they discounted? (see also Matter 4A transport)

1.10 The Transport Background Paper (July 2024, BP14, paras 4.6 to 4.10) sets out the three growth scenarios that were initially tested in terms of impact on the A27 Chichester Bypass, as part of the Preferred Approach Transport Study (December 2018, TA06), which at that time was considering a plan period of up to 2035/2036. In summary there were:

- Scenario 1 - 650 dwellings per annum (dpa)
- Scenario 2 - 800 dpa
- Scenario 3 – 1,000 dpa

1.11 The findings demonstrated that Scenario 1, with the mitigation in place, was likely to provide a level of service on the network that is no worse than the reference case, and this was taken forward.

1.12 Once the difficulty around delivery of the full package of A27 mitigation proposals was known, the council, in 2021 moved to an 'infrastructure constrained approach'. The background to how that approach was reached is set out in paras 5.1 to 5.19 of the Transport Background Paper, the approach itself is set out in paras 5.20 to 5.22.

1.13 The work that followed concluded that Plan could only deliver 535 dpa in the southern plan area (due to the impacts of higher delivery on the Strategic Road Network (SRN) and associated Local Highway Network (LHN)). As part of this assessment 700 dpa in the southern plan area was also considered and viability tested, to see whether that level of housing could still be mitigated without significantly increasing the scale and costs of the A27 mitigation proposals but would provide for a sufficient level of funding to deliver the full mitigation package. The outcome was that the 700 dpa would likely be the extent of delivery without significant further interventions on the A27, but that the funding that would be secured would still fall well short of that required for

the full mitigation package. In the absence of being able to deliver the full package of works, the impacts on the A27 were even more pronounced than the figure derived through the standard method. The assessment undertaken is set out in paras 5.39 to 5.46 of the Transport Background Paper.

Q.15 The final paragraph of the Policy says 'To ensure that the council delivers its housing target, the distribution of development may need to be flexibly applied, within the overall context of seeking to ensure that the majority of new housing is developed in accordance with this Strategy where appropriate and consistent with other policies in this plan. Any changes to the distribution will be clearly evidenced and monitored through the Authority Monitoring Report'. What is meant by 'flexibly applied'? Is the Policy clearly written and unambiguous, so it is evident how a decision maker should react to development proposals?

1.14 The wording is intended to reflect that windfall development could come forward within the settlement boundaries in addition to the planned distribution of development, which would result in a different distribution of development. However, following consideration of the question, the council have suggested an additional modification (see Council's suggested modification schedule, Version 2 (CDC15.01), ref CAM400 and below). This modification would address the issue as it is agreed that the wording is unclear and cannot be easily modified to make it less ambiguous.

Additional suggested modification CAM400:

~~"To ensure that the council delivers its housing target, the distribution of development may need to be flexibly applied, within the overall context of seeking to ensure that the majority of new housing is developed in accordance with this Strategy where appropriate and consistent with other policies in this plan. Any changes to the distribution will be clearly evidenced and monitored through the Authority Monitoring Report."~~

Q.16 Are the proposed main modifications (MMs) necessary for soundness?

1.15 Supporting text modifications CM036 and CM037 are necessary for soundness as they provide clarification that the setting of the National Park is an important consideration.

1.16 Policy S1 modification CM039 is necessary for soundness as it reflects the change to the spatial strategy to propose additional growth in the north of the plan area, therefore 'supporting' is more accurate than 'where opportunities arise'.

1.17 Policy S1 modification CM040 is a minor modification not necessary for soundness.

1.18 Key diagram modifications CM041 and CM042 are important corrections and clarifications. Key diagram modifications CM043 – CM045 are minor modifications to correct and clarify the key diagram.

Policy S2 Settlement Hierarchy

Q.17 Is the proposed settlement hierarchy justified?

1.19 The Settlement Hierarchy Update Background Paper May 2024 (BP11) sets out the assessment methodology used to establish the settlement hierarchy and how the final settlement hierarchy detailed in Policy S2 was determined. The four settlement type classifications set out in the Local Plan Adopted Chichester Local Plan: Key Policies 2014-2029 (CD01, pages 38 to 41) were carried forward to Policy S2 of the new Plan (SD01, page 42). The settlement hierarchy is justified as it follows the broad principles set out in the NPPF as detailed at paragraph 2.2 of the Background Paper and is based on up-to-date evidence.

Q.18 Are the proposed settlement boundaries justified and would they be effective?

1.20 Yes, the proposed settlement boundaries are justified and would be effective. The settlement boundaries are closely drawn given there is a presumption in favour of development of land within the settlement boundaries, and therefore land has only been included within the boundary where development has been deemed acceptable subject to compliance with development plan policies.

1.21 The approach to the settlement boundaries and how they have been reviewed is established through Section 3 (Methodology) of the Settlement Boundaries Background Paper (May 2024, BP10), which sets out the criteria for considering whether a boundary should be amended. For example, the settlement boundaries have been updated where development has taken place adjacent to the existing boundary, such as where a site has been implemented on the edge of an existing settlement (such as Shopwyke Lakes).

1.22 Amendments have been proposed to the settlement boundaries for Chichester city, East Wittering & Bracklesham, North Mundham/Runcton, Stockbridge and Westhampnett. Settlement boundaries may also be reviewed and amended as part of the neighbourhood planning process, or through a subsequent Site Allocation Development Plan Document.

Q.19 Are the suggested MMs necessary for soundness?

1.23 CM046 is a minor modification to avoid repetition of the word 'local'. CM047 is a minor modification to correct the capitalisation of the word 'rest'.